

1 V.R. Bohman, Esq.  
2 Nevada Bar No. 13075  
3 Erin M. Gettel, Esq.  
4 Nevada Bar No. 13877  
5 SNELL & WILMER L.L.P.  
6 3883 Howard Hughes Parkway, Suite 1100  
7 Las Vegas, NV 89169  
8 Telephone: (702) 784-5200  
9 Facsimile: (702) 784-5252  
10 vbohman@swlaw.com  
11 egettel@swlaw.com

12 *Attorneys for Defendants*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 HOLLYWOOD CITIZEN NEWS  
16 OPERATING COMPANY, LLC, and  
17 HOLLYWOOD CITIZEN NEWS F&B,  
18 LLC,

19 Plaintiffs,

20 vs.

21 TEN FIVE HOSPITALITY LLC, and DAN  
22 DALEY,

23 Defendants.

24 Case No. 2:23-cv-01126-APG-DJA

25 **STIPULATION TO EXTEND TIME  
26 TO RESPOND TO PLAINTIFFS'  
27 COMPLAINT (ECF NO. 1) AND  
28 MOTION FOR PRELIMINARY  
INJUNCTION AND TO COMMENCE  
DISCOVERY (ECF NOS. 3 AND 4)**

29 **(FIRST REQUEST)**

30 **Snell & Wilmer**  
31 **L.L.P.**  
32 **LAW OFFICES**  
33 **3883 Howard Hughes Parkway, Suite 1100**  
34 **Las Vegas, Nevada 89169**  
35 **702.784.5200**

1 Plaintiffs Hollywood Citizen News Operating Company, LLC and Hollywood Citizen  
2 News F&B, LLC (collectively, “Plaintiffs”) and Defendants Ten Five Hospitality LLC and  
3 Dan Daley (collectively, “Defendants” and, together with Plaintiffs, the “Parties”), by and through  
4 their undersigned counsel, for good cause shown, hereby stipulate and agree that Defendants’  
5 counsel will accept service on behalf of Dan Daley, without prejudice to Mr. Daley’s defenses or  
6 objections except under FRCP 12(b)(5), and to extend Defendants’ deadline to file their response  
7 to Plaintiffs’ Motion for Preliminary Injunction and Leave to Immediately Commence Discovery  
8 [ECF Nos. 3 and 4] (the “Motion”) from August 7, 2023, to August 18, 2023, to extend  
9 Defendants’ deadline to answer, move, or otherwise respond to the Complaint [ECF No. 1] from  
10 August 14, 2023, to August 18, 2023, and to extend Plaintiff’s reply deadline relative to the  
11 Motion to September 1, 2023, for the following reasons:

12 1. Plaintiffs served the Complaint and the Motion on July 24, 2023.

13 2. Defendants' response to the Motion is currently due on August 7, 2023.

14 3. Defendants' response to the Complaint is currently due on August 14, 2023.

15 4. Defendants' counsel has conflicting professional commitments and previously  
16 scheduled travel planned between July 24 and August 14, 2023, and the Complaint and Motion  
17 present complex and interrelated legal and factual issues warranting an extension of time for  
18 Defendants' responses.

19 5. Defendants are reviewing Plaintiffs' request for leave to immediately serve  
20 discovery (*see* ECF Nos. 3 and 4, at § IV), to determine whether this issue can be resolved by  
21 stipulation before Defendants' response date, and the Parties agree to meet and confer regarding  
22 the same.

23 6. This extension is sought in good faith and is not made for the purpose of delay.

24 | / / /

1           THEREFORE, the Parties respectfully request an extension for Defendants to file  
2 their response to the Motion from August 7, 2023 to and including August 18, 2023, to file a  
3 response to the Complaint from August 14, 2023, to August 18, 2023, and of Plaintiffs' reply  
4 deadline relative to the Motion to September 1, 2023.

5           **THE PARTIES SO STIPULATE**

6           Dated: July 31, 2023

7           GARMAN TURNER GORDON LLP

8           By: /s/ Dylan Ciciliano

9           Dylan T. Ciciliano  
10           Nevada Bar No. 12348  
11           Email: dciciliano@gtg.legal  
12           7251 Amigo Street, Suite 210  
13           Las Vegas, Nevada 89119  
14           Tel: (725) 777-3000  
15           Fax: (725) 777-3112

16           KASOWITZ BENSON TORRES LLP

17           Jennifer S. Recine (admitted pro hac vice)  
18           Email: JRecine@kasowitz.com  
19           Donald J. Reinhard (admitted pro hac vice)  
20           Email: DReinhard@kasowitz.com  
21           Sean M. Sigillito (admitted pro hac vice)  
22           Email: SSigillito@kasowitz.com  
23           1633 Broadway  
24           New York, New York 10019  
25           Tel: (212) 506-1700  
26           Fax: (212) 506-1800

27           *Attorneys for Plaintiffs*

28           Dated: July 31, 2023

1           SNELL & WILMER L.L.P.

2           By: /s/ V.R. Bohman

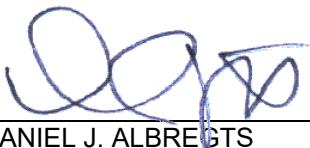
3           V.R. Bohman, Esq.  
4           Nevada Bar No. 13075  
5           Erin M. Gettel, Esq.  
6           Nevada Bar No. 13877  
7           SNELL & WILMER L.L.P.  
8           3883 Howard Hughes Pkwy., Ste. 1100  
9           Las Vegas, NV 89169  
10           Telephone: (702) 784-5200  
11           Facsimile: (702) 784-5252  
12           vbohman@swlaw.com  
13           egettel@swlaw.com

14           *Attorneys for Defendants*

15           **ORDER**

16           **IT IS SO ORDERED.**

17           DATED: this 3rd day of August 2023.

18             
19           DANIEL J. ALBREGTS  
20           UNITED STATES MAGISTRATE JUDGE

21           4883-4136-8179